

1 Scott A. Kronland (SBN 171693)  
2 Stacey M. Leyton (SBN 203827)  
3 Eileen B. Goldsmith (SBN 218029)  
4 Danielle E. Leonard (SBN 218201)  
5 Robin S. Tholin (SBN 344845)  
6 James Baltzer (SBN 332232)  
7 ALTSHULER BERZON LLP  
8 177 Post Street, Suite 300  
9 San Francisco, CA 94108  
10 Tel. (415) 421-7151  
11 Fax (415) 362-8064  
12 skronland@altber.com  
13 sleyton@altber.com  
14 egoldsmith@altber.com  
15 dleonard@altber.com  
16 rtholin@altber.com  
17 jrbaltzer@altber.com

*Attorneys for Plaintiffs*

[Additional Counsel not listed]

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

AMERICAN FEDERATION OF  
GOVERNMENT EMPLOYEES, AFL-CIO;  
AMERICAN FEDERATION OF STATE  
COUNTY AND MUNICIPAL EMPLOYEES,  
AFL-CIO, et al.,

Plaintiffs,

v.

UNITED STATES OFFICE OF PERSONNEL  
MANAGEMENT, et al.,

Defendants.

Case No. 3:25-cv-01780-WHA

**DECLARATION OF JADA  
COMMODORE**

**DECLARATION OF JADA COMMODORE**

I, Jada Commodore, declare as follows:

1. I am a legal administrative assistant employed by Altshuler Berzon LLP. I am over 18 years of age and competent to give this declaration. This declaration is based on my personal knowledge, information, and belief.

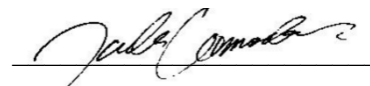
2. I have reviewed the spreadsheets filed by Defendants on March 31, 2025 in connection with Defendants' Response to Plaintiffs' Motion to Compel Compliance with Preliminary Injunction or to Hold Defendants in Contempt, Dkts. 168-2, 168-3, and 168-4. I was directed to determine the number of terminated probationary employees listed in the spreadsheet who had been returned to administrative leave, and the number returned to active service, for the departments that provided those spreadsheets.

3. At the Department of Defense (Dkt. 168-2), 211 terminated probationary employees had already been returned to full duty as of March 31, 2025, and one was scheduled to return to full duty on April 2. No terminated probationary employees were listed as being on administrative leave.

4. At the Department of Veterans Affairs (Dkt. 168-3), 1,069 terminated probationary employees had already been returned to full duty as of March 31, 2025, and another 93 had scheduled dates to return to full duty. Four terminated probationary employees were listed as being on administrative leave. No status was provided for 530 terminated probationary employees.

5. At the Department of the Interior (Dkt. 168-4), 1,095 terminated probationary employees had already been returned to full duty as of March 31, 2025. Another 683 terminated probationary employees were listed as being on administrative leave.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed April 3, 2025 at San Francisco, California.

  
Jada Commodore